

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

**JOHN DOE,**

*Plaintiff,*

v.

**FURMAN UNIVERSITY,**

*Defendant.*

**ANSWERS TO  
INTERROGATORIES –  
LOCAL RULE 26.01**

The Plaintiff, through his undersigned counsel, responds to the Local Rule 26.01 interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**Plaintiff is not aware of any subrogation interests.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**The Plaintiff has requested a jury trial in the pleadings.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**Not applicable.**

(D) State the basis for asserting the claim in the division in which it was filed

**The acts giving rise to the Complaint occurred in Greenville County, which makes this the proper division for the case.**

(E) Is this action related in whole or part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of

the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or properties; or for any reason would entail substantial duplication of labor if heard by different judges.

**There are no related cases counsel is aware of.**

Respectfully Submitted,

**s/ Joshua Snow Kendrick**  
Joshua Snow Kendrick (9037)  
Christopher S. Leonard (10998)  
KENDRICK & LEONARD, P.C.  
7 Mills Avenue (29605)  
P.O. Box 6938  
Greenville, SC 29606  
Tel: (864) 760-4000  
[Josh@KendrickLeonard.com](mailto:Josh@KendrickLeonard.com)

October 28, 2024  
Greenville, South Carolina